

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA**

**UNITED STATES OF AMERICA**

**VERSUS**

**THE CITY OF NEW ORLEANS**

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**CIVIL ACTION**

**NO: 12-1924**

**SECTION “E”**

**MAGISTRATE “2”**

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**THE CITY OF NEW ORLEANS’ MEMORANDUM  
IN RESPONSE TO MOTIONS TO INTERVENE**

**NOW INTO COURT**, through undersigned counsel, comes the City of New Orleans (“the City”) and responds to the Motions to Intervene filed by proposed intervenors the Fraternal Order of Police, the Police Association of New Orleans, the Office of the Independent Police Monitor, and Community United for Change (“Intervenors”).

On July 24, 2012, the City of New Orleans and the United States Department of Justice announced the final details of a Consent Decree more than two years in the making. The Consent Decree will completely transform the New Orleans Police Department (“NOPD”), improving operations and administration, and ensuring constitutional policing. Some of those changes already are taking place, but timely and efficient implementation of the Decree is of utmost importance for the total transformation of the NOPD.

During negotiations, the Department of Justice and the City consulted repeatedly with a broad swath of stakeholders to ensure that all interested parties have had and will have their interests fairly considered in the substance and implementation of the Decree. The Department of Justice has stated that it has participated in scores of community meetings and repeatedly had

one-on-one conversations with community and criminal justice stakeholders throughout New Orleans, including police officers, supervisors, and commanders; representatives from all three NOPD police organizations; the Independent Police Monitor; police reform and social justice advocates; immigrant rights groups; LGBT advocates; anti-sexual assault and domestic violence advocates; victims of alleged police abuse; members of neighborhood community-police groups; individuals working in the Office of the Public Defender; the District Attorney's office; and federal law enforcement agents who work in joint task forces with New Orleans police officers.

Many of the ideas for reform that are in the Consent Decree came directly from these interactions. The Department of Justice in particular has a legal obligation to represent the interests of *all* individuals in ensuring that the Constitution is fully and fairly enforced. Likewise, the City represented its police officers by soliciting input from officers throughout the negotiation process. A retired NOPD officer fully participated on the negotiation team to represent the interests of NOPD and its officers and to act as their liaison throughout the process. Moreover, the City met with some officers assigned to or overseeing specific units to discuss the reforms that most directly related to their unit.

As evidenced by these efforts, the City acknowledges the importance of the stakeholders' input. The City reiterates, however, its desire for timely and efficient implementation of the Consent Decree. The fundamental changes the Decree will bring to the NOPD culture are vital to the well-being of the entire city. As a result, the City intends to implement those reforms with a sense of urgency and purpose. Indeed, in light of this urgency, the City and NOPD already have implemented some critical changes regarding, for example, the plan to fight crime. But the majority of fundamental reforms, which will greatly improve the effectiveness and integrity of the NOPD, are dependent on implementation of the Consent Decree. Any unnecessary delay in

the implementation of those reforms will be counter to the interests of the entire New Orleans community. After more than two years of hard work and extensive negotiations, the citizens of New Orleans deserve to experience the positive effect of the Consent Decree without further delay.

Respectfully submitted,

/s/ Erica N. Beck

**ERICA N. BECK, LSB #30000**

CHIEF DEPUTY

**SHARONDA R. WILLIAMS, LSB #28809**

CHIEF OF LITIGATION

**CHURITA H. HANSELL, LSB #25694**

DEPUTY CITY ATTORNEY

**MATTHEW J. LINDSAY, LSB #30599**

ASSISTANT CITY ATTORNEY

**CHRISTY C. HAROWSKI, LSB #30712**

ASSISTANT CITY ATTORNEY

**MARY KATHERINE TAYLOR, LBS #32719**

ASSISTANT CITY ATTORNEY

**RICHARD F. CORTIZAS, LSB #28890**

CITY ATTORNEY

1300 PERDIDO STREET

CITY HALL - ROOM 5E03

NEW ORLEANS, LOUISIANA 70112

TELEPHONE: (504) 658-9800

FACSIMILE: (504) 658-9868

**RALPH CAPITELLI, LSB #3858**

**BRIAN CAPITELLI, LSB #27398**

CAPITELLI & WICKER

ENERGY CENTRE

1100 POYDRAS STREET, SUITE 2950

NEW ORLEANS, LOUISIANA 70163

TELEPHONE: (504) 582-2425

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the above and foregoing pleading has been served upon all counsel of record via electronic filing this 14th day of August, 2012.

/s/ Erica N. Beck